

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MAKE THE ROAD NEW YORK, AFRICAN
SERVICES COMMITTEE, CENTRAL
AMERICAN REFUGEE CENTER NEW YORK,
CATHOLIC CHARITIES COMMUNITY
SERVICES (ARCHDIOCESE OF NEW YORK),
CATHOLIC LEGAL IMMIGRATION NETWORK,
INC., ALICIA DOE, BRENDA DOE, CARL DOE,
DIANA DOE, and ERIC DOE,

Plaintiffs,

- against -

ANTONY BLINKEN, in his official capacity as
Secretary of State; the UNITED STATES
DEPARTMENT OF STATE; XAVIER BECERRA,
in his official capacity as Secretary of the
Department of Health and Human Services; and the
UNITED STATES DEPARTMENT OF HEALTH
& HUMAN SERVICES,

Defendants.

No. 1:19-cv-11633-GBD-OTW

**NOTICE OF PLAINTIFFS’
MOTION FOR ATTORNEYS’ FEES**

Please take notice that Plaintiffs will move before the Honorable Ona T. Wang, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an order pursuant to the Equal Access to Justice Act (“EAJA”), 5 U.S.C. § 504 and 28 U.S.C. § 2412, awarding fees and costs as prevailing parties in this action.

A memorandum of law and the Declarations of Joanna Elise Cuevas Ingram, Andrew J. Ehrlich, Baher Azmy, and Susan Welber, together with their respective exhibits, support this motion and are filed contemporaneously herewith.

Dated: New York, New York
February 27, 2024

THE NATIONAL IMMIGRATION LAW CENTER

By: /s/ Joanna Elise Cuevas Ingram
Joanna Elise Cuevas Ingram (JC 2704)

P.O. Box 170392
Brooklyn, NY 11217
(213) 377-5258
cuevasingram@nilc.org

Nicholas Espíritu (admitted *pro hac vice*)
Tanya Broder (admitted *pro hac vice*)
3450 Wilshire Blvd., 108-62
Los Angeles, CA 90010
espiritu@nilc.org
broder@nilc.org
Counsel for Plaintiffs

CENTER FOR CONSTITUTIONAL RIGHTS

By: /s/ Baher Azmy
Baher Azmy

666 Broadway
7th Floor
New York, New York 10012
(212) 614-6445
bazmy@ccrjustice.org

THE LEGAL AID SOCIETY

By: /s/ Susan E. Welber
Susan E. Welber

Bronx Neighborhood Office, Civil Practice
260 East 161st Street, 8th Floor
Bronx, NY 10451
SEWelber@legal-aid.org

Judith Goldiner
Civil Law Reform Unit

Deborah Lee
Immigration Law Unit
49 Thomas Street
New York, New York 10013
jgoldiner@legal-aid.org
dslee@legal-aid.org

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

By: /s/ Andrew J. Ehrlich

Andrew J. Ehrlich

Jonathan H. Hurwitz

1285 Avenue of the Americas
New York, New York 10019-6064
(212) 373-3000
aehrlich@paulweiss.com
jhurwitz@paulweiss.com